UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

August 19, 2008

Reply to
Attn. of: ETPA-088 Ref: 05-042-AFS

Dale Hom, Forest Supervisor
1835 Black Lake Blvd. SW, Suite A
Olympia, WA 98512

Dear Mr. Hom;

EPA has reviewed the **Dosewallips Road Washout Project Draft Environmental Impact Statement (EIS)** (CEQ No. 20080234). Our comments are provided in accordance with our responsibilities and authorities under Clean Air Act §309, Clean Water Act §404, and the National Environmental Policy Act (NEPA).

The Olympic National Forest (ONF) and the Western Federal Lands Highway Division (WFLHD) of the Federal Highway Administration (FHWA), in cooperation with the Olympic National Park (ONP) has prepared this Draft EIS to evaluate the potential impacts of repairing two washout areas along the Dosewallips Road. The first washout in ONF removed 310 feet of Forest Service Road (FSR) 2610, which is 10 miles west of Brinnon, Washington. This washout occurred during a January 2002 storm event. The washout has since increased in size to 500 feet as measured in December 2007. The second washout in ONP is located on the Dosewallips Road, which is an extension of FSR 2610. This washout occurred as a result of a storm event in late 2003. Damage occurred near the Dosewallips Falls when log retaining walls failed, resulting in slumping of the road fill.

The Draft EIS analyzes three action alternatives, including a No Action Alternative. A preferred alternative has not been identified. The following alternatives include:

Alternative A (No Action). The two washout areas on FSR 2610 in ONF and on the Dosewallips Road in ONP would not be repaired. Motorized access on FSR 2610 would end at or near the washout area. Measures would be provided for public safety by blocking access with a traffic barrier with signs to warn motorists of the road closure.

Alternative B (Reroute 1 Bench Emphasis). The proposed action includes the construction of approximately 0.84 mile long x 14-feet wide single lane road with turnouts above and to the north of the washout site using standard construction methods (balancing cuts and fills). Approximately 17,000 cubic yards (cy) of excess material would be disposed of off-site. Approximately 7.1 acres of Late-Successional Reserve (LSR) would be cleared. About 0.7 mile of FSR 2610 would be decommissioned. Approximately 120 feet of the Dosewallips Road in ONP would be repaired by removing the old road fill material and reconstructing the road prism using rip rap and crushed rock to form a foundation on which structural backfill would be constructed. Alternative B would require five (5) amendments to LSR and Riparian Reserve (RR) standards and guidelines of the Northwest Forest Plan.

Alternative C (Reroute 2 Retaining Wall Emphasis). This alternative is similar to Alternative B except that construction methods such as retaining walls and reinforced fills would be used to minimize the cleared area, reducing clearing of the LSR to about 6.5 acres (8 percent reduction from Alternative B). Approximately 33,800 cy of material would be disposed off site. The Dosewallips Road in ONP would

be repaired as described in Alternative B. This alternative would require four (4) Forest Plan amendments to LSR and RR standards and guidelines.

Alternative F (Bridge). This alternative would include construction of a 14-feet wide, single-lane bridge about 700-feet long spanning the washout on FSR 2610. The bridge would be constructed of pre-case spans and would be supported by 5 to 7 piers. ONP would repair the washout on Dosewallips Road as in Alternative B. There would be one (1) Forest Plan amendment to RR standards and guidelines.

On September 16, 2005, EPA provided scoping comments in response to the Notice of Intent (NOI) regarding the Dosewallips Road Washout Project. In presenting the Purpose and Need for the project, we recommended that the EIS reflect not only the Forest Service's purpose and need but also the broader public interest and need for motorized and non-motorized access in ONF and ONP and that the Purpose and Need should also support improvements to watershed health and fisheries. We recommended that the EIS include an action alternative that fully evaluates the option of decommissioning the road beyond the washout area, which was identified in a previous Environmental Assessment (EA). The DEIS does not include a road decommissioning alternative, but analyzes only the no action alternative and those alternatives that provide motorized access to developed recreation facilities, stating that this meets Forest objectives and desired conditions as identified in the Olympic National Forest Land and Resource Management Plan (1990) and park goals and mission. EPA believes that because the range of alternatives is limited, the DEIS does not fully consider additional alternatives that would best meet other key forest management objectives such as those laid out in the Northwest Forest Plan's Aquatic Conservation Strategy and protection of Tier 1 Key Watersheds, designed to protect water quality and at-risk fish species.

Based on our concerns about potential impacts to water quality and aquatic habitat, EPA has assigned a rating of "EC-2" (Environmental Concerns – Insufficient Information) to the Dosewallips Road Washout Project DEIS. Please find enclosed detailed written comments that provide the basis for our rating. A copy of EPA's rating system criteria used in conducting our environmental review can be found at: http://www.epa.gov/compliance/nepa/comments/ratings.html. This rating and a summary of our comments will be published in the *Federal Register*.

EPA appreciates the opportunity to review and provide comments on the Dosewallips Road Washout Project Draft EIS. If you have any questions regarding this letter, please do not hesitate to contact Mark Jen of my staff in the EPA Alaska Operations Office in Anchorage at (907) 271-3411 or jen.mark@epa.gov.

Sincerely,

/s/
Christine Reichgott, Manager
NEPA Review Unit

Enclosure

ENCLOSURE

EPA Region 10 Comments on the Dosewallips Road Washout Project

Purpose and Need, Range of Alternatives

The Draft EIS identifies the Purpose and Need to reestablish road access on FSR 2610 and Dosewallips Road to ONF and ONP recreational facilities based on the desired condition. The desired condition for this project is to restore public and administrative motorized access (e.g. passenger cars, vehicles pulling trailers, and RVs) to pre-washout standards. As Federal land managers of trust resources, there appear to be additional public interests and needs for this project that warrant further consideration of the overall project Purpose and Need.

Recommendation. The Final EIS should reevaluate the Purpose and Need statement to reflect the public need for recreational backcountry access to ONF and ONP recreational facilities, such as hiking trails, and should provide information about current levels of use of trails and the two campgrounds.

Recommendation. The Final EIS should evaluate action alternatives which could include rehabilitating FSR 2610 for non-motorized hiking trails and constructing a footbridge over the washout area. This alternative was evaluated in a previous EA, and was considered but eliminated from detailed study in the Draft EIS.

Recommendation. The Final EIS should provide future traffic projections of the number, type, volume, and frequency of motorized vehicles that would utilize FSR 2610 and the Dosewallips Road. This information is important to demonstrate the public need for motorized vehicle access to ONF and ONP, to determine whether the road design standard is appropriate for the projected traffic volume, and whether existing public campground facilities are adequate to accommodate the volume of motorized vehicles using these facilities after access is restored.

The Dosewallips River is designated a Tier 1 Key Watershed in the Northwest Forest Plan with an emphasis on protection and restoration of aquatic habitat on federal lands within the watershed. The Hood Canal Coordinating Council's Salmon Habitat Recovery Strategy for Hood Canal designated the Dosewallips River as a Tier I watershed, which is considered to be the most important areas based on regional importance significance to Endangered Species Act (ESA) listed fish stocks, and Salmonid Stock Inventory stocks listed as critical and depressed.

Recommendation. The Purpose and Need for this project should reflect consistency with established management plans and strategies to improve watershed health and support restoration and recovery of "threatened" and "depressed" anadromous fish species listed under ESA, such as Puget Sound Chinook Salmon, Steelhead Trout, and their critical habitat in the Dosewallips River watershed.

Alternatives B and C would involve rerouting of 0.84 mile of single lane road above and to the north of the washout site of FSR 2610. Segment 2 of the reroute road would be about 1,750 feet long and would involve steep grades (up to 10 percent) and steep side slopes (80 to 100 percent). This segment contains wetlands, small streams and seeps. There are signs of past slope movements. During the construction of Segment 2 with the removal of riparian vegetation, the exposure of unstable soils, and the cut and fill of steep side slopes, there could be substantial slope instability and movement resulting in erosion and sedimentation to adjacent wetlands and small streams. Fine sediments would be discharged into the small Coho rearing tributary of Gamm Creek and eventually becoming deposited into the Dosewallips River.

Recommendation. The Final EIS should reevaluate Alternatives B and C to avoid and/or minimize potential adverse impacts to water quality, wetlands and water bodies that support at-risk fish species. Alternative alignments to the proposed reroute of the washout areas should be considered to avoid sensitive water bodies and unstable steep side slopes along Segment 2.

Recommendation. The Final EIS should provide additional information regarding implementation of erosion control, slope stabilization, and drainage measures during and after road construction activities to minimize sedimentation and turbidity of downstream water bodies. In particular, the Final EIS should provide for detailed design drawings of the proposed road reroute alignment of FSR 2610 in ONF and reconstruction of the Dosewallips Road at MP 0.85 in ONP (cross section and overview section). The descriptions of the type, location, and number of culverts, stability and drainage structures, retaining walls, reinforced fills should be disclosed in the Final EIS to evaluate the magnitude of the environmental impacts.

Alternatives B and C include the decommissioning of about 0.7 mile of FSR 2610, located on either side of the washout to the take off points for the reroute. Decommissioning the section of road upstream of the washout would involve removal of drainage structures. The surface would be removed; the roadbed would be ripped and replanted with appropriate native, woody vegetation. The downstream section would involve removal of drainage structures and the road fill to an extent to facilitate wetland restoration.

Recommendation. The Final EIS should describe the decommission plan for the 0.7 mile segment of FSR 2610 upstream and downstream of the washout location. The decommission plan should discuss measures for erosion and sediment control, estimates of fill material to be removed, disposal of fill material and drainage structures removed, a revegetation planting plan (e.g., species and density of planting), specific field monitoring requirements during and after decommissioning to ensure that revegetation is successful. The plan should include corrective actions in the event that revegetation does not meet the project success criteria/performance standards.

Water Quality

The Draft EIS describes the potential adverse impacts to water quality resulting from the construction of the road reroute. In particular, water quality standards for turbidity may be exceeded as exposed soils become unstable and erode into drainage areas and eventually into the Dosewallips River. Fine sediments can enter the river and result in adverse impacts to threatened fisheries resources, its critical habitat, and other aquatic species. The lower reach near the mouth of the Dosewallips River is identified on the 2004 Clean Water Act §303(d) list as being water quality limited for temperature. Any activities on federal land should ensure that water quality standards for these impaired water bodies are not further exceeded.

Recommendation. The Final EIS should provide a description of the erosion and sediment control structures and best management practices that would be implemented during and after road construction activities as required under a Storm Water Pollution Prevention Plan (SWPPP) to minimize adverse impacts to water quality of the Dosewallips River.

Least Environmentally Damaging Practicable Alternative (LEDPA)

Pursuant to Clean Water Act (CWA) §404, a permit issued by the Corps of Engineers is required for any discharge of dredged or fill material into waters of the United States, including wetlands. Alternatives B, C, and F would required a federal permit evaluated against the CWA §404(b)(1) Guidelines (Guidelines). The Guidelines allow permit issuance for only the Least Environmentally

Damaging Practicable Alternative (LEDPA). The LEDPA considers two factors: (1) the environmental impact, and (2) the practicability of the proposed action. An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.

In general, Alternatives B and C represent modifications of the same alternative. Alternative C includes mitigation measures, such as retaining walls and reinforced fills that would reduce the clearing of the LSR from 7.1 acres to about 6.5 acres (8 percent reduction from Alternative B). However, under Alternative C, twice as much fill material would be disposed of offsite as compared to Alternative B. In terms of practicability, Alternative C would cost $1.2 M more than Alternative B and the logistics of constructing Alternative C may be more challenging. As discussed under the Purpose and Need, Range of Alternatives section, additional information regarding avoidance and minimization of environmental impacts is necessary before the LEDPA can be determined.

Alternative F would include the construction of a 700-ft long bridge spanning the washout area on FSR 2610. The in-water piers and hardening of the upstream and downstream bank abutments using rip rap may modify the natural hydrogeomorphic processes of the Dosewallips River at the bridge site and downstream. The rip rap and in-water bridge piers could deflect some of the river's energy and flow away from the outside high bank. Flow velocities around the piers may increase substantially and result in local scour and depression on the channel bed. Large woody debris may pile up onto the bridge piers and may threaten the integrity of the bridge. On-going and costly maintenance activities may be required for this alternative.

Alternative F may have negative impacts on fish spawning, migration, and rearing in the Dosewallips River watershed. Construction of the bridge would include in-stream water diversions, excavation for bridge piers, placement of rip rap may contribute to increased turbidity and finer sediment inputs. Finer sediments may cover or smother recently spawned eggs or smolts, reducing incubation and rearing success. Under ESA, Alternative F may negatively affect threatened Puget Sound Chinook and its critical habitat. Alternative F would adversely affect essential fish habitat (EFH) due to sediment and turbidity impacts associated with the in-stream construction to Chinook, Coho and pink habitat in the mainstem Dosewallips River.

Under this alternative, the proposed activities may adversely affect marbled murrelet and its Critical Habitat Unit WA-06a due to harassment from noise generating activities during the early breeding season. The proposed bridge activities may adversely affect the northern spotted owl and designated Critical Habitat Unit WA-49 resulting from noise disturbance during construction activities and the removal of suitable habitat.

In terms of practicability, Alternative F has the highest estimated construction costs of all three action alternatives. It is approximately three (3) times the cost of Alternative B and two (2) times the cost of Alternative C. The logistics of constructing a bridge may be more challenging than rerouting a road. Alternative F may not be practicable compared to Alternatives B and C. Based on our preliminary Guidelines evaluation, Alternative F may not represent the LEDPA

Air Quality

The ONP is designated a Class I area under the Clean Air Act (CAA). The goal of the CAA is to restore the visibility of Class I areas to its natural conditions. Federal land managers are charged with the responsibility for protecting the air quality and related values (including visibility) of Class I lands. The Draft EIS fails to disclose this designation or evaluate the effects of the alternatives on the air quality of the ONP.

Recommendation. The Final EIS should discuss the effects of the alternatives on the Class I designation of the ONP. The analysis should include an evaluation of the contribution of motorized vehicles to the visibility of the ONP, and as a source of mobile air pollutants. An estimate of the types and quantities of emissions produced by motorized vehicles should be compared with the National Ambient Air Quality Standards (NAAQS). The Final EIS should discuss how this project would support the goal of the CAA to restore the visibility of the ONP to natural conditions and would be consistent with the Washington State Implementation Plan (SIP).

Environmental Justice

The Draft EIS concludes that the proposed activities and environmental impacts would not result in disproportionately high and adverse human health or environmental effects on minority or low income populations. However, there was no analysis in the document or discussion on what efforts were taken to meet environmental justice requirements consistent with E.O. 12898.

Recommendation. The Final EIS should include a full disclosure of the methodology and criteria utilized for identifying low income and people of color communities, accounting of impacts on low income or minority communities, and a determination if the impacts to such communities will be disproportionately higher than those on non-low income or minority communities. For communities, if any, bearing disproportionately high and adverse effects, what opportunities have been provided for meaningful input on the decisions being made on this project?